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Hearing Date: July 20, 2011 at 10:00 a.m. (Prevailing Eastern Time)

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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re: : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

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Debtors. : (Jointly Administered)

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JOINDER OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS IN LEHMAN COMMERCIAL PAPER INC.'S RESPONSE TO MOTION OF EVANGELICAL CHRISTIAN CREDIT UNION PURSUANT TO SECTION 362(d) OF THE BANKRUPTCY CODE FOR RELIEF FROM THE AUTOMATIC STAY

The Official Committee of Unsecured Creditors (the "<u>Committee</u>") of Lehman Brothers Holdings Inc. and its affiliated debtors in possession (collectively, the "<u>Debtors</u>") hereby joins in the Debtors' objection [Docket No. 18304] (the "<u>Objection</u>")¹ to the Motion of Evangelical Christian Credit Union Pursuant to Section 362(d) of the Bankruptcy Code for Relief From the Automatic Stay [Docket No. 16259] (the "Motion").

JOINDER

1. The Committee joins in the Debtors' objection to the relief sought in the Motion for each of the reasons set forth in the Objection, including, without limitation, the following: (i) the Old Church Parcel is instrumental to the development of the Emerald

Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Objection.

Meadows Project and its continued inclusion in the Emerald Meadows Project is necessary to enhance LCPI's estate's potential for recovery on LCPI's investments in the Emerald Meadows Project; and (ii) under the doctrine of marshaling, ECCU should be required to first satisfy its claim out of the Additional Collateral, on which LCPI has no lien, before it seeks recourse to the Old Church Parcel.

WHEREFORE, the Committee respectfully requests that the Court (i) deny the relief requested in the Motion, and (ii) grant such other relief as is just.

Dated:

New York, New York

July 6, 2011

MILBANK, TWEED, HADLEY & McCLOY LLP

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